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*Of Attorneys for Amici Curiae Washington County
District Attorney, Clackamas County District Attorney,
and Marion County District Attorney*

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

DISABILITY RIGHTS OREGON,
METROPOLITAN PUBLIC DEFENDER
SERVICES, INC., and A.J. MADISON,

Civil No.: 3:02-cv-00339-MO (Lead Case)

Plaintiffs,

v.

PATRICK ALLEN, in his official capacity as head of the Oregon Health Authority, and DOLORES MATTEUCCI, in her official capacity as Superintendent of the Oregon State Hospital,

Defendants.

Civil No.: 3:21-cv-01637-MO (Trailing Case)

**DECLARATION OF BILLY J.
WILLIAMS IN SUPPORT OF MOTION
FOR LEAVE TO APPEAR AS AMICI
CURIAE BY THE DISTRICT
ATTORNEYS FOR WASHINGTON,
CLACKAMAS AND MARION
COUNTIES**

JARROD BOWMAN, JOSHAWN
DOUGLAS-SIMPSON,

Plaintiffs,

v.

DOLORES MATTEUCCI, Superintendent of the Oregon State Hospital, in her individual

**Page 1 – DECLARATION OF BILLY J. WILLIAMS IN SUPPORT OF MOTION FOR
LEAVE TO APPEAR AS AMICI CURIAE BY THE DISTRICT ATTORNEYS FOR
WASHINGTON, CLACKAMAS AND MARION COUNTIES**

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and official capacity, PATRICK ALLEN,
Oregon Health Authority, in his individual and
official capacity,

Defendants.

I, Billy J. Williams, declare and say subject to penalty of perjury:

1. I am one of the attorneys representing the *Amici Curiae* in this action and the following is true to the best of my knowledge, information, and belief. I provide this declaration in support of the Washington County District Attorney, Clackamas County District Attorney, and the Marion County District Attorney's motion to appear *Amici Curiae*.
2. Pursuant to LR 7-1(a), I participated in a conferral regarding the motion to appear *Amici Curiae* with counsel for the parties via email dated August 26, 2022. Attached hereto as Exhibit 1 is a true copy of the email sent to counsel for plaintiffs and defendants. Additionally I attempted to speak with counsel listed in the email via phone call/message.
3. To the best of my knowledge and memory, during that conferral, Defendant's counsel does not raise objections to the District Attorneys for the counties of Washington, Clackamas and Marion appearing *Amici Curiae*. Counsel for Plaintiff Disability Rights Oregon objects to the aforementioned District Attorneys' participation. Counsel for Plaintiff Metropolitan Public Defender, Bowman, and Douglas-Simpson objects to participation by the aforementioned District Attorneys.

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**Page 2 – DECLARATION OF BILLY J. WILLIAMS IN SUPPORT OF MOTION FOR
LEAVE TO APPEAR AS AMICI CURIAE BY THE DISTRICT ATTORNEYS FOR
WASHINGTON, CLACKAMAS AND MARION COUNTIES**

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I declare under penalty of perjury that the foregoing is true and correct.

Executed: August 26, 2022

BEST BEST & KRIEGER LLP

By: *s/ Billy J. Williams*
BILLY J. WILLIAMS, Bar No. 901366
billy.williams@bbklaw.com

Attorneys for *Amici Curiae*
Washington County District Attorney,
Clackamas County District Attorney, and
Marion County District Attorney

From: Billy Williams
Sent: Friday, August 26, 2022 12:17 PM
To: 'ethan@lmhlegal.com'; 'jessie@lmhlegal.com'; 'craig.m.johnson@doj.state.or.us'; 'sheila.potter@doj.state.or.us'; 'carla.a.scott@doj.state.or.us'; 'norah@lmhlegal.com'; 'ecooper@droregon.org'; 'tstenson@droregon.org'; 'kwilde@droregon.org'
Cc: Josh Newton; Sarah Monkton
Subject: Motion For Leave to Appear as Amici Curiae Compliance with LR 7-1

Counsel,

I am writing to advise you that we have been engaged by Kevin Barton (Washington County District Attorney), Paige Clarkson (Marion County District Attorney), and John Wentworth (Clackamas County District Attorney). I am preparing a *Motion For Leave to Appear as Amicus Curiae* in Bowman et al v. Matteucci et al, Lead Case 3:02-cv-00339-MO. It is our intent to file this motion today and to appear at the hearing before Judge Mosman scheduled for Monday, August 29.

In summary, the reasons for asking the court to allow these three elected District Attorneys (DAs) to appear and participate as amicus curiae in the action is that they believe that they can be helpful to the court and parties. The DAs are independently elected officials that work within each county and are answerable to their respective communities on all public safety matters and the effectiveness of the criminal justice system. Obviously, they have significant interests in the subject matters of the pending case. It is our belief that they are essential participants in this action.

My ask in this email is that you respond on behalf your clients on whether you oppose the motion to appear as amici. I have left voicemail messages prior to sending this email. I have been informed that Counsel for Plaintiff Disability Rights Oregon objects to amicus participation by the District Attorneys mentioned. We intend to file by the end of today.

Respectfully,

Billy Williams



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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of August, 2022, I filed a true and correct copy of the foregoing document with the Clerk of the Court for the United States District Court – District of Oregon via the CM/ECF system. Participants in this case who are registered CM/ECF users will be served by the CM/ECF system.

BEST BEST & KRIEGER LLP

s/ Josh Newton

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Of Attorneys for Amici Curiae